



ENVIRONMENTAL SERVICES DEPARTMENT
AIR QUALITY DIVISION
1001 N. Central Avenue
Phoenix, Arizona 85004

Technical Guidance #TG98-002

March 11, 1998

Rule: 350, subsection 301.2

Subject: Requirement for P/V valves

Issue: Subsection 301.2 of Rule 350 requires pressure/vacuum (P/V) containment valves on a variety of tanks that store organic liquids having a true vapor pressure of 1.5 psi or greater. As the rule is currently constructed, this requirement applies not only to fixed roof tanks above a certain size, but to both floating-roof tanks and pressure-tanks as well.

Discussion: Both floating-roof tanks and pressure-tanks are designed and engineered to control vapor emissions without the use of pressure/vacuum valves. The use of such a valve would not produce additional emissions control. The rule's authors had no intention of requiring P/V valves on floating roof tanks or pressure tanks, but failed to recognize that the way they constructed the rule would result in this unintended and erroneous interpretation.

Conclusion: The subsection 301.2 requirement to have a pressure/vacuum valve does not apply to floating roof tanks or pressure tanks.

(Historical note: This technical guidance document is derived from the now rescinded technical guidance #TG-006 of 12/9/93.)